

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CORPORAL TRINIDAD NAVARRO,	:	
	:	
Plaintiff,	:	C.A. No. 05-565 GMS
	:	
v.	:	JURY TRIAL DEMANDED
	:	
CHRISTOPHER A. COONS,	:	
individually and in his official capacity;	:	
GUY H. SAPP, individually and in his	:	
official capacity; and NEW CASTLE	:	
COUNTY, a municipal corporation,	:	
	:	
Defendants.	:	

**PLAINTIFF'S SPECIAL INTERROGATORIES**  
**TO THE JURY**

Do you find from a preponderance of the evidence:

1. That the actions of the Defendants were "under color" of the authority of the State?

Yes or No \_\_\_\_\_

2. That the Plaintiff engaged in constitutionally protected political activity, a form of free speech, as defined in the Court's instructions by exercising his right to political association and/or freedom of speech?

Yes or No \_\_\_\_\_

3. That such protected political activity by the Plaintiff was a substantial or motivating factor in the Defendants' decision to not promote the Plaintiff?

Yes or No \_\_\_\_\_

If you answered "No" to any of the preceding questions you need not answer the remaining questions.

4. That the Defendants acts were the proximate or legal cause of damages sustained by the Plaintiff?

Yes or No \_\_\_\_\_

5. How much do you award Plaintiff for his damages?

\_\_\_\_\_

SO SAY WE ALL.

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Foreperson

Dated: \_\_\_\_\_